

From: [DGS Website@DGS](mailto:DGS_Website@DGS)
To: CBSC@DGS; dominique.taudin@carrier.com
Subject: PUBLIC COMMENT on PROPOSED BUILDING STANDARDS - Dominique Taudin
Date: Monday, June 5, 2023 1:55:46 PM

Commenter Contact Information

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Date: 6/5/2023 12:00:00 AM
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Proposed Building Standard

Title 24 Part #: Part 4
Section #: 1104.10 (new)
Proposing State Agency: SFM
This comment is intended for review during: 45-Day Comment Period

Your recommendation based on the criteria of Health and Safety Code Section 18930(a):
Approve as Amended

In support of your recommendation above, provide the rationale based on the criteria of Health and Safety Code Section 18930(a). If you recommend anything other than approve, cite the criteria in your comment. If you oppose a proposed building standard, offer a solution or alternative for the state agency to consider.

Carrier supports the proposals in SFM 05/22 because they help align the California Mechanical Code with 2024 national model codes, including the 2024 UMC, with respect to equipment using lower GWP refrigerants, most of which are Safety Class A2L. As proposed, the mechanical code is silent on commercial refrigeration using A2L refrigerants. Adding a new Section 1104.10, as proposed below, provides additional clarity regarding situations where A2L refrigerants can be employed for high probability, direct refrigeration systems.

1104.10 Applications for Commercial Refrigeration. High-probability commercial refrigeration systems using Group A2L refrigerants shall comply with the equipment listing and ASHRAE 15.

We respectfully ask for the Commission's support of SFM 05/22 with the addition of Section 1104.10, as proposed above.

9 Point Criteria Info:
18930(a) 3